

CCP EnviroNews

June 2004

Environmental News from the CCP - Saukville Facility

Welcome to the Sixth Edition of CCP EnviroNews

EnviroNews is one way for us to share information with neighbors and the Saukville community about new developments relating to CCP's environmental programs and performance. In this issue, you can read about:

- New DNR air permit for the CCP Saukville facility;
- CCP receives *Business Friend of the Environment* award;
- Recent noise and odor complaints;
- Results of the first external Loss Control Audit at the Saukville facility; and
- Update on CCP's Community Advisory Committee.

As always, if you have any questions or concerns about CCP operations, please contact Plant Manager Glenn Preisler at 268-3395.

DNR Issues Air Permit to CCP

On November 14, 2003, the DNR reissued an air permit for the CCP Saukville facility, restricting air pollutant emissions for a five year period. The permit reissuance process started in 2002 when CCP submitted a permit application, including plans and specifications, for the operation of our Saukville polymers and synthetic resins production facility.

The DNR then reviewed the various CCP operations for their air pollution control

technologies, impact upon air quality and to ensure compliance with all applicable rules and legal requirements. After this extensive analysis, the DNR issued a draft permit, sought public input and then finalized the new permit. A copy of the permit is available in the CCP binder at the Saukville Public Library and on the DNR's web site.

Air emissions from the following CCP plant operations are regulated in the new permit:

- Natural gas combustion units for heating process fluids
- Resin production
- Non-hazardous solid waste incinerator
- Non-hazardous liquid waste incinerator
- Anhydrides storage
- Styrene storage and transfer

All DNR air permits regulate emissions of carbon monoxide, nitrogen oxides, particulate matter and volatile organic compounds. CCP's air permit also controls emissions of chemicals used extensively at our Saukville facility including: dicyclopentadiene, ethyl benzene, ethylene glycol, glycol ethers, maleic anhydride, methyl methacrylate, phthalic anhydride, styrene, toluene diisocyanate and xylene.

CCP has produced easy-to-read chemical fact sheets for most of the hazardous air pollutants regulated in the DNR air permit. These are available in the CCP binder in the library or from Plant Manager Glenn Preisler (268-3395).

In our application to DNR, we requested several additional requirements beyond the necessary permit conditions. The combined effect of these voluntary requirements is to reduce emissions and to qualify our facility for a lower classification as a “minor” rather than “major source.” Major sources must submit a compliance report twice a year, rather than once a year. Often, when new regulations are written, major sources are singled out for extra requirements since they are by definition large emitters. If a facility voluntarily accepts limitations (or “caps”) on its emissions through permit conditions, the DNR can re-classify it as a minor source.

Under the new permit, the CCP Saukville facility is now considered a minor source by the DNR. We were able to achieve “minor source” status because our thermal oxidizer operates at a very high efficiency in controlling all air emissions captured in the closed piping system from resin production.

Air emissions will continue to decline when CCP shuts down both of its nonhazardous waste incinerators by the end of the year—the one that burns off reaction water after the xylene is removed and the one that burns solid waste like wood and cardboard. As part of our environmental management system, CCP will evaluate recycling of solid waste that is currently burned in the incinerator. The water that is currently burned will be shipped offsite.

Wisconsin Manufacturers and Commerce Presents Business Friend of the Environment Award to CCP Saukville Facility

Nine Wisconsin companies recently received the prestigious Wisconsin Business Friend of the Environment Award for outstanding achievements in environmental protection from Wisconsin Manufacturers and Commerce (WMC)—and CCP was one of them! The nine winners were chosen by an independent panel of judges representing industry, state government, and the University of Wisconsin.

“These companies are the vanguard of good environmental citizenship in Wisconsin,” said Jeff Schoepke, director of the Wisconsin Environmental Working Group, the affiliate of Wisconsin Manufacturers and Commerce which sponsors the annual awards. “Every day, they use innovation to go beyond government mandates to keep Wisconsin clean.” Business Friend of the Environment Award winners are categorized according to number of employees and judged in the areas of pollution prevention, environmental innovation and environmental stewardship.

WMC honored CCP for “actively seeking and courting feedback, involvement, concerns and ideas from their neighbors,” establishing an environmental management system, looking for new ways to reduce waste and prevent pollution, and creating a 24-hour phone line along with odor-reporting forms.

In addition, DNR Secretary Scott Hassett, in his October 2003 report to the Legislature for the Cooperative Environmental Agreement Program, called CCP’s efforts “a model for Wisconsin and nationally of cooperative community approaches that work.”

It’s nice to be noticed by others around the state, but it is much more important to us that our neighbors in the Village of Saukville are happy with our performance and that you continue to let us know how we are doing and how we can do it better.

Loss Control Audit

The CCP Saukville facility recently underwent an external audit of its environmental and other management systems. This audit considered all aspects of **loss control**—health, safety, environmental, production and quality. The audit team gave the CCP Saukville facility a strong score on this initial external audit and made recommendations to CCP management for improvements. Among the more important suggestions were—

- Conduct loss control tours of the facility independent of planned general inspections.
- Consider actively involving employees in internal audits.
- Conduct a review of all equipment to identify those whose function is primarily health, safety or environmental (HSE) protection. Document inspection of all identified HSE equipment in one place.
- Identify all mobile and materials-handling equipment and other equipment requiring pre-use inspection and develop a pre-use inspection system.
- Evaluate the potential severity and probable frequency of recurrence for each reported loss incident (actual loss events as well as near-misses).
- Distribute a written announcement with general information about each major or high potential incident within 48 hours.
- Require licenses for employees operating mobile equipment.
- Develop a system for periodic review of relevant engineering regulations, codes and industry standards to insure compliance.

In commenting on the results of this audit, Mike Gromacki, CCP Director of Quality/Safety/Environment, said “CCP management and employees will work together to upgrade our loss control systems based on the recommendations of the external audit. Our goal is continuous improvement.”

Odor and Noise Complaints

Since the start of the year, our neighbors have called in six complaints—five related to odor and one noise complaint. (Although, we haven’t heard yet from our advisory committee which meets in July.) There was only one complaint during the first three months of the year. As spring neared, the weather warmed, people started opening windows or spending more time outside, and we received more complaints in April and May. Each complaint was seriously investigated and a cause sought. When a specific activity could be quickly identified, we attempted to modify it to reduce odor or noise.

“Remember—the quicker you call us about a problem, the greater the chance that we can do something to make it better,” commented Glenn Preisler, Saukville Plant Manager.

Our odor and noise hotline number is 284-0555 during the day and 268-3399 after work hours.

We are still working hard to try to reduce the noise problem from our alarm system. Many are false alarms that are disruptive to both neighbors and CCP employees. We initially focused on preventing false alarms. New probes were installed on problem tanks but this did not solve the problem; in fact it seemed to make the problem worse. CCP continues to focus on ways to reduce the duration of the alarms before they are responded to and turned off by staff.

Want more information on the DNR-CCP cooperative environmental agreement, CCP’s Community Advisory Committee, last year’s community survey or the CCP environmental outreach plan?

There is a CCP binder with lots of good information on these and related topics at the Saukville Public Library, 151 S. Main Street. (Telephone—284-6022)

CCP Community Advisory Committee

The Community Advisory Committee continues to provide valuable input and feedback to us. After meeting quarterly for almost three years, the committee decided that they do not need to meet as often now and agreed to switch to twice-a-year meetings.

The next Community Advisory Committee meeting will be July 14 at 7:00 at CCP.

We invite neighbors and community members to attend and learn about what the advisory committee does and about CCP's environmental protection efforts. **This meeting will include a plant tour and refreshments will be served.** Also—if you are interested in being a member of the committee, please call Glenn Preisler at 268-3395.

If you have questions or comments about anything you read about in this newsletter, please call Plant Manager Glenn Preisler at 268-3395.

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